

Aaron L. Agenbroad (State Bar No. 242613)  
alagenbroad@jonesday.com

JONES DAY  
555 California Street, 26th Floor  
San Francisco, CA 94104  
Telephone: (415) 626-3939  
Facsimile: (415) 875-5700

Attorneys for WASHINGTON GROUP  
INTERNATIONAL, INC., A DIVISION OF URS  
CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: KATRINA CANAL BREACHES  
CONSOLIDATED LITIGATION**

**PERTAINS TO: MRGO**

**(PENDING IN THE UNITED STATES  
DISTRICT COURT FOR THE EASTERN  
DISTRICT OF LOUISIANA AS CIVIL  
ACTION NO. 05-4182 "K" (2) BEFORE  
HON. STANWOOD R. DUVAL, JR.),**

**Defendant.**

**Case No. MISC. NO. 08-CV-  
80007MISC (PJH)**

**STIPULATION AND [PROPOSED]  
ORDER ADJUSTING  
SUPPLEMENTAL BRIEFING  
SCHEDULE**

Date: April 16, 2008  
Time: 10:00 a.m.  
Courtroom: G, 15<sup>th</sup> Floor  
Judge: Hon. Bernard Zimmerman

WHEREAS, the Court has currently scheduled a hearing on the pending Discovery Motions (i.e. the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production; the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation; the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production; and the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation) for April 16, 2008 at 10:00 a.m.;

WHEREAS, the Court issued an Order on March 5, 2008, requiring supplemental briefing

1 on the discovery motions pursuant to a schedule (i.e. the Plaintiffs, University and Professor Bea  
2 to file a supplemental brief by March 21, 2008; Washington Group to file an opposition by March  
3 31, 2008; any reply to be filed by April 7, 2008);

4 WHEREAS, the parties believe that they may be able to mutually resolve a majority, if  
5 not all, of the disputed issues involved in the discovery motions in the near future;

6 WHEREAS, an adjustment to the deadlines for the parties respective supplemental briefs  
7 may facilitate this mutual resolution;

8 WHEREAS, such an adjustment to the deadlines for the parties' briefs will not affect the  
9 April 16, 2008 hearing date, but will provide the parties with an opportunity to either obviate the  
10 need for that hearing or to substantially limit the number and/or scope of issues to be addressed at  
11 that hearing;

12 IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that deadlines  
13 for the parties' respective supplemental briefs are as follows:

- 14 • The Plaintiffs, University and Professor Bea's supplemental briefs must be filed by  
15 March 26, 2008;
- 16 • Washington Group's opposition must be filed by April 2, 2008;
- 17 • Any reply brief must be filed by April 7, 2008

18 Dated: March 20, 2008

19 /s/ - Aaron L. Agenbroad  
20 Aaron L. Agenbroad (State Bar No. 242613)  
21 alagenbroad@jonesday.com  
22 Jones Day  
23 555 California Street  
24 26th Floor  
25 San Francisco, CA 94104-1500  
26 Telephone: (415) 626-3939  
27 Facsimile: (415) 875-5700

28 Attorneys for Washington Group  
International, Inc., a division of URS  
Corporation

1  
2  
3 Dated: March 20, 2008

/s/ Joseph C. Wilson  
\_\_\_\_\_  
Joseph C. Wilson (State Bar No. 249027)  
jwilson@cpmlegal.com  
Cotchett, Pitre & McCarthy  
San Francisco Airport Office Center  
840 Malcom Road, Suite 200  
Burlingame, CA 94010  
Telephone: (650) 697-6000  
Facsimile: (650) 697-0577

7  
8 Attorneys for MR-GO Plaintiffs' Sub-Group  
Litigation Committee

9  
10  
11 Dated: March 20, 2008

/s/ - Christopher M. Patti  
\_\_\_\_\_  
Christopher M. Patti  
Christopher.Patti@ucop.edu  
University of California  
Office of the General Counsel  
1111 Franklin Street, 8th Floor  
Oakland, California 94607-5200  
Telephone: (510) 987-9739  
Facsimile: (510) 987-5757

16 Attorney for U.C. Berkeley and Professors  
Reimer, Seed, Pestana and Bray

**[PROPOSED] ORDER**

The Court, having considered the above stipulation of the parties, and good cause appearing, hereby ORDERS:

1. The deadlines for the parties supplemental briefs are as follows:
  - The Plaintiffs, University and Professor Bea's supplemental briefs must be filed by March 26, 2008;
  - Washington Group's opposition must be filed by April 2, 2008; and
  - Any reply brief must be filed by April 7, 2008.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. BERNARD ZIMMERMAN  
United States Magistrate Judge